



**Testimony
Elizabeth Gara
Connecticut Water Works Association (CWWA)
Before the
Public Health Committee
March 14, 2014**

The Connecticut Water Works Association (CWWA) *supports with revisions* **HB - 5530 - CONCERNING THE DEPARTMENT OF PUBLIC HEALTH'S RECOMMENDATIONS REGARDING BULK WATER HAULERS.**

CWVA, which represents municipal, private and regional water companies, supports efforts to regulate bulk haulers to ensure that water meets appropriate water quality standards. For small systems, in particular, bulk haulers are like the cavalry and are relied upon to supplement water supplies under certain circumstances. As such, it is critical that safeguards are in place to ensure that bulk haulers provide water that meets or exceeds state and federal water quality standards.

However, CWVA notes that a provision in Section 1(e) appears to limit the ability of public water suppliers to utilize bulk water hauling to meet certain public water supply needs. Although we recognize that bulk water to supplement supplies should not be used on a permanent basis, there are occasions where public water suppliers have encountered difficulties or delays in obtaining permits, land, etc. needed to develop or upgrade a supply to provide a long-term solution. Under these circumstances, bulk haulers are critical to meeting the public health and safety needs of residents.

Moreover, the term “temporary” is not defined and will invite different interpretations that may create issues in meeting certain water supply needs. Further, it is not and should not be the licensed haulers’ responsibility to judge or be involved in regulatory actions between the state Department of Public Health and any regulated water utility regarding the appropriate duration for use of bulk water deliveries.

To address these concerns, CWVA recommends that the following sentence in Section 1(e) lines 29-31 be deleted, “*Bulk water hauling to a public water system shall be permitted only as a temporary measure to alleviate the public water system's short-term water supply shortage.*” Thank you for the opportunity to testify. We are always available to meet with committee members to discuss these issues more fully.

We also recommend that in establishing the requirements to ensure that any water transported by a bulk water hauler is fit for human consumption, the department require haulers to use vehicles with the appropriate equipment, such as air-gapped hard-piped fill, to safeguard against any potential cross contamination issues. Also, tanks should be maintained in such a manner as to ensure the water is potable.